COMMONWEALTH OF KENTUCKY KENTUCKY GENERAL ASSEMBLY In the House of Representatives

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House Clerk's Office

IN RE: Impeachment of Attorney General Daniel Cameron

PETITIONERS' MOTION TO STRIKE PLEADING

Come the Petitioners, Hon. Kevin Glogower and three Grand Jurors and Ms. Linda
Smith, by counsel, and MOVE TO STRIKE inappropriate portions of the pleadings before this
Impeachment Committee. In support of this Motion, Petitioners would show as follows:

The Response filed by Attorney General contains significant personal attacks on the citizens who filed this serious concern with the Legislature. As the Commonwealth's highest ranking law enforcement official, Attorney General Cameron holds a trust granted to him by the citizens of the state. The overly broad and rambling response to the concise and narrowly written impeachment petition contains pages of attacks on the citizens who filed it. That is a clear abuse of that trust and power and is an embarrassment to the Commonwealth.

The Attorney General has the duty to listen to the voices of those he serves and to respect their serious concerns. There is no place in this process for belittling the private citizens and voters who raise such concerns. Any negative or personal reference to Smith, Glogower, the grand jurors or the dedicated public servants who "signed in support" should be stricken from the Response. This body should require that a corrected pleading with all inappropriate personal attacks removed be filed by the Attorney General within two (2) working days.

The Response also falsely claims partisan politics and contains significant gender bias.

AG Cameron criticizes counsel based on her past clients and husband's past job. These statements should be promptly deleted. In 2021 we elected women to serve as State Treasurer

and as Lt. Governor in Kentucky and a woman to lead the nation as Vice President. We are well

past the time when women are defined by what their husbands once did.

Counsel for Petitioners has represented dozens of Democratic candidates, county parties,

PACs, and organizations pro bono each year over the past three decades. She has also

represented hundreds of Republicans and Independents in her private practice over the same time

period. This action was not brought by her husband or any of her former clients and claims to

the contrary are specious and should be removed.

While the present Petition was brought by Democratic voters, the scope of the action

complained of adversely impacted Kentucky residents of all parties and is not partisan in nature.

The counsel authoring the Response should be sanctioned for their gender bias and cautioned to

confine their discussion to the serious matter before this Committee. Pages 24-25 of the

Response should be stricken for this reason and the Attorney General should be required to file a

corrected document with those inappropriate statements removed within two (2) working days.

Respectfully submitted

/s/ Anna Stewart Whites /s/

Anna Stewart Whites

327 Logan Street Frankfort KY 40601

(502)352-2373

Annawhites@aol.com

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CERTIFICATE OF SERVICE

It is hereby certified that the foregoing document was served electronically on Clerk of the House, Speaker Osborne and Minority Leader Jenkins, and on counsel for the Attorney General, Hon. Barry Dunn and Hon. Victor Maddox, 700 Capitol Avenue, Suite 118, Frankfort KY 40601and Hon. Christopher Thacker, Billings Law Firm PLLC, 145 Constitution Street, Lexington KY 40507, this the 1st day of February, 2021.

/s/ Anna Stewart Whites /s/	
Attorney for Petitioners	